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July 11, 2001

Kathleen Martwick
Associate Regional Counsel
U.S. Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Re: DuSable Park Site Characterization

Dear Kathy:

This letter responds to your telephone inquiry of a couple of weeks ago about Kerr-McGee's willingness to undertake site characterization in DuSable Park. After review of the results of EPA's "walkover" survey and the conduct of its own testing, Kerr-McGee is unpersuaded that further, site-wide characterization is warranted.

With the knowledge of Fred Micke, Kerr-McGee has conducted certain work at DuSable Park in order to reach a better informed judgment about the need for systematic, site-wide characterization. It examined three areas where Larry Jensen's walkover gamma survey indicated the possibility of elevated levels of radionuclides. The first (Area A) was in the north central portion of the park. The second (Area B) was at the east end of Water Street, and the third (Area C) was on the south side of the park. In none of these three areas was surface gamma radiation encountered above standards. Of soil samples taken in each of these three areas, two appeared to have no radionuclides above background. In Area B, a soil sample showed 6.5 pCi/g. This sample, taken from the "hottest area" suggested by Larry Jensen's work, is below the 7.1 pCi/g action criteria for the Streeterville area.

On the basis of this testing, Kerr-McGee has tentatively concluded that systematic, site-wide characterization is not warranted. Instead, Kerr-McGee suggests that the Park District or its contractors, conduct monitoring during any excavation or earth moving that may be necessary to improve the site for purposes of use as a park. Such monitoring

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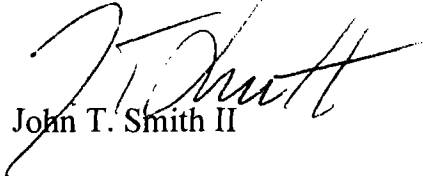
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could help insure that levels of radionuclides above EPA action levels are not "turned up" or removed from the site for offsite disposal.

Sincerely,

A handwritten signature in black ink, appearing to read "J. T. Smith II", written over the printed name.

John T. Smith II